

## EXECUTIVE SUMMARY

The United States Army Corps of Engineers (USACE) and the City of El Paso, Texas retained Tecumseh Professional Associates, Inc. (Tecumseh) to perform a Phase I Environmental Site Assessment (ESA) on two contiguous properties located within the City of El Paso, at 5115 and 5169 El Paso Drive (the Subject Site). The Phase I ESA has been conducted according to American Society for Testing and Materials (ASTM) Designation E 1527-00 guidelines and in accordance with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 120(H), U.S. Army Corps of Engineers Regulation 1165-2-132 HTRW Guidance for Civil Works Projects, and generally accepted environmental industry standards. Tecumseh's Phase I ESA was prepared during June of 2002.

Two previous assessments were conducted at the Subject Site. McClelland Management Services, Inc. (MMS) conducted an environmental site assessment with limited sampling for suspected asbestos containing material (ACM) in 1991. The assessment confirmed ACM in floor tile and mastic in a utility closet, electrical closet, employee lunchroom, in two offices, and in insulation on a boiler door. MMS recommended that an operations and maintenance program be established for controlling all ACM. MMS did not recommend removal of the tile. No other recognized environmental conditions were identified at the Subject Site as a result of the MMS environmental site assessment.

AGRA Earth & Environmental (AGRA) conducted a limiting sampling and analysis program at the Subject Site in 1995. The program included soil borings, with the soil samples tested for manganese, potassium, sodium, chlorides, and sulfate. Soil pH was also measured. Soil samples were collected at the north and south side of the building at 5115 El Paso Drive, at the northeast corner of 5169 El Paso Drive next to the wastewater treatment facility (concrete underground storage tank [UST]), and in the storm water catch basin at the front of this property. AGRA reported that concentrations of compounds targeted during their investigation were within published ranges for unaffected native materials, and that concentrations of target compounds in the areas where potential wastes were used were comparable to the background sample concentrations for all parameters. Soil pH was found to be elevated in only one sample, and AGRA reported that the pH of 9.0 in that particular sample was slightly above the background range for the Subject Site (AGRA, 1995).

**This assessment has revealed the following recognized environmental conditions on the Subject Site at the following locations:**

### **5169 El Paso Drive**

There is one unregistered UST located at 5169 El Paso Drive. The UST is an open top concrete tank that appears to be a pre-treatment facility for effluent generated from the former operation at the property. Chemicals that have been used at this facility include potassium permanganate, sodium bisulfite, sodium hydroxide, acetic acid, and hydrogen peroxide. Material safety data sheets for these chemicals are presented in Appendix E. The tank has greater than one-half of its volume below the ground surface. The tank is equipped with multiple inlet pipes that exit the process/warehouse building and enter the tank. A discharge pipe situated higher than the inlet pipes is at the opposite end from the inlets. All metal hardware on the tank is heavily corroded. The discharge pipe appears to connect to the City of El Paso sewer system as evidenced by multiple manhole covers located in an adjacent concrete basin that is in alignment with the tank and discharge pipe. On the day of the site visit, approximately one third of the tank volume contained fluid that appeared to be wastewater with an oil skim floating on the surface. The tank and the entire area around the tank emitted a strong chemical odor on the day of Tecumseh's site visit. The top of the tank is open and presents a falling

*5115 and 5169 El Paso Drive  
El Paso, Texas 79905*

*Phase I Environmental Site Assessment  
Tecumseh Professional Associates, Inc.*

and drowning hazard to persons or animals that may investigate the tank. It is possible that the tank has leaked some of its contents to the surrounding soil via permeable or cracked concrete or a leaking steel pipe. Strong evidence exists of a chemical release or a material threat of a release that could present a material risk of harm to public health or the environment at this UST site. The property bordering 5169 El Paso Drive to the north that is less than 20 feet from the concrete UST is a single-family residence. A more in depth discussion regarding this UST is presented in Sections 6.1 and 6.3. A site map of this property is provided in Appendix A.

The property at 5169 El Paso Drive used and stored various hazardous chemicals. On May 31, 2002, the day of the pre-project site walk-through, there were containers of acetic acid, hydrogen peroxide, sodium hydroxide, and unknown quantities of DeeZee brand chemicals stored in the building. None of the chemical containers were equipped with secondary containment. Located outside the building next to the concrete UST was an empty 55-gallon drum stenciled methanol. The garment business occupying this property was close to shutting down its operation on the day of the pre-project site walk-through.

On June 13, 2002, the official day of the site visit, the garment business occupying this property had completely moved out and the building had been closed up for an undetermined amount of time. Upon entering the building, a strong chemical odor was noticed throughout the building. This facility also used potassium permanganate in its garment bleaching process as documented in the environmental site assessment conducted by MMS in September 1991. From visual observation made during the preliminary walk-through and during the official site visit, Tecumseh believes that it is possible that hazardous materials spilled on the floor, discharged through the catch channels integrated in the floor of the building, and in steel drainpipes could have penetrated the floor of the building and contaminated the soil beneath the building.

There is also a series of pipes that run from the front of the building underground to a concrete pad where three above ground storage tanks (ASTs) were positioned. These ASTs reportedly contained potassium permanganate (MMS, 1991). The chemical was probably transferred into the building via these pipelines. There is also a catch channel in the concrete pad where the ASTs were placed. The catch channel terminates at a sump located at the north end of the concrete pad. The parking lot has been dug up at least twice in the immediate area of the underground pipelines and the sump. There is a possibility that the soil could have been contaminated with potassium permanganate in this area via leaking pipelines and or leaking drainpipes connected to the sump. There is a small storm water catch basin located immediately south and adjacent to the area where the ASTs were located. If the ASTs were overfilled, or if any leakage occurred, the liquid could have drained into this catch basin.

### **5115 El Paso Drive**

Located north of the building at 5115 El Paso Drive is a storm water catch basin that has a confined area of stained soil. The catch basin collects storm water that drains off the west side of the building's roof via gutters onto a concrete channel that directs the water towards the catch basin. There is also a 2-inch diameter steel pipe that protrudes through the west wall of the building just above the level of the concrete channel. The maintenance room is located in the area where the pipe enters the building. The steel pipe extends to and terminates in the storm water catch basin. On the day of the site visit, the catch basin was dry and there was no obvious soil staining at the discharge point of the 2-inch diameter steel pipe. There was evidence that fluid had once flowed out the pipe and into the catch basin. The walls of the catch basin on the west side are dark in color and on closer inspection look to be cinders (material that has been heated to high temperatures). There are pieces of roofing tar, and an area where liquid roof tar or asphalt was dumped in the catch basin. The liquid stained the soil down the side of the catch basin wall and in a confined area in the bottom. The catch

basin also contained domestic garbage that blew into the pit or was randomly placed there. The total amount of garbage is estimated to be less than a cubic yard. A site map of this property is provided in Appendix A.

#### **Other Environmental Issues:**

Located at 5115 El Paso Drive, in the detached metal building where air compressors are located, were a number of different chemicals placed randomly around the room. The chemicals consisted of two 30-gallon containers of sodium hydroxide (one empty and one partially full), one empty 5-gallon container of sodium hydroxide, two 5-gallon containers of compressor oil (one empty and one partially full), a container of WEM CL 595 Tower Brom 90M, and two 1-gallon containers of bleach. None of the chemical containers had secondary containment. The floor of this building was stained beneath and around one of the compressors.

Also at 5115 El Paso Drive in the warehouse portion of the building is a janitor's washroom where cleaning chemicals are stored. The chemicals stored there included one 5-gallon container and one 55-gallon drum of cold-water floor stripper (labeled corrosive), and one 5-gallon container of Power Kleen 283 PTB cleaner and degreaser (a concentrated detergent). The floor of this room was stained and dirty and showed the effects of storing and handling chemicals over a long period of time.

Located at the northwest corner of the building at 5115 El Paso Drive in the warehouse area is a separate room called the maintenance room. The door to this room was locked on the day of the pre-project meeting and site walk-through. Located just outside this secured room were drums of acetic acid and sodium hydroxide placed in close proximity to each other. These two chemicals are not compatible and posed a potential hazard should the chemicals leak and contact each other. All the chemical drums were sitting in individual portable secondary containment basins. The entrance door to this room is fitted with a National Fire Protection Association (NFPA) chemical placard that states "Corrosive." This room did not contain any chemicals on the day of the site visit but two pieces of equipment were located there. The floor has some minor staining and this room emitted a chemical odor even though the swamp cooler was running and circulating fresh air throughout the room.

#### **This assessment revealed potential recognized environmental conditions off-site that could impact the Subject Site.**

There is an area of concern off-site that borders the Subject Site that should be examined. The residence at 5159 El Paso Drive is also used as an auto repair shop as indicated by a faded out sign painted on the west side of the building that states "Auto Repair". There are numerous automobiles in various degrees of disassembly and repair located on the property. On the day of the pre-project meeting and site walk-through, two individuals were working under the hood of a car.

The items of concern include used motor oil, antifreeze (ethylene glycol), gasoline, solvents, and wet cell batteries containing sulfuric acid and lead metal. The concern involves the possible disposal of the above-mentioned items on-site that could impact the Subject Site.

Located approximately 150 feet north from a portion of 5115 El Paso Drive are the railroad tracks of the Texas and Pacific Railroad. Located within the railroad tracks right-of-way is an underground pipeline that contains diesel fuel. This pipeline could have leaked diesel fuel, although no documentation has been found to support this theory.

#### **Summary of recognized environmental conditions on the Subject Site:**

This section is included to fulfill the requirements of the USACE Scope of Work, Section 3.0, for the City of El Paso Brownfield Program, Hazardous Toxic Radioactive Waste (HTRW) Phase I Site Assessment at 5115 and 5169 El Paso Drive, Dated May 15, 2002 Section 3.0

5169 El Paso Drive, El Paso, Texas 79905

Source: Potential-LUST, leaking above ground and underground pipelines & drain lines on property

Location: Building and 20 feet perimeter around building

GPS Units: 31° 46' 16" north latitude, and 106° 25' 43" west longitude

Survey: Lots 3 through 10, inclusive, Block 1, Hadlock's Suburban Gardens, an addition to the City of El Paso, El Paso County, Texas

Contaminate(s): Potential-potassium permanganate, sodium bisulfite, sodium hydroxide, acetic acid, and hydrogen peroxide

Exposure Routes: Potential-Soil, Surface Water

Exposed Populations: Potential-residents within immediate area (less than 300 feet)

Health Effects: Potential Adverse Health Effects-"medium" for residents within immediate area

Environmental Consequences: Contaminated soil around building and UST, and beneath building and UST

Legal Liability: Potential-Level and Extent: high potential for legal liability

- The concrete UST or pre-treatment facility for plant effluent may have leaked some of its contents to the surrounding soil via permeable or cracked concrete or leaking steel pipes.
- There is evidence at this UST site that a chemical release or a material threat of a release has occurred that could present a material risk of harm to public health or the environment. In the immediate area of the UST there is a strong chemical odor, and all metal piping and hardware attached to the UST is heavily corroded. The UST pre-treatment facility has treated caustic and/or corrosive chemicals.
- The UST contained an oil skim on the surface of the standing water the day of the site visit.
- The property bordering 5169 El Paso Drive to the north, the structure that is less than 20 feet from the concrete UST is a single-family residence.
- Plant effluent that possibly leaked from the UST may have impacted soils off-site. The UST is located next to the northern property boundary of the Subject Site.
- The top of the UST is open and presents a falling and drowning hazard to persons or animals that may investigate the tank.

Cost Remediation/Removal Actions: Investigation Project, Initial Phase II ESA-estimated to cost \$50,000

Response Actions: Limited soil, standing water, and groundwater sampling. Sampling may indicate other actions needed.

5115 El Paso Drive, El Paso, Texas 79905

Source: Illegal dumping and disposing of materials through above ground pipeline

Location: Storm water catch basin

5115 and 5169 El Paso Drive  
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GPS Units:	31° 46' 20" north latitude, and 106° 25' 46" west longitude
Survey:	Tracts 26A, 26B, 26B2, 26C, 27A, 27A1 and 27A2 Elijah Bennett Survey No. 11, an addition to the City of El Paso, El Paso County, Texas.
Contaminate(s):	Potential petroleum hydrocarbon (asphalt, tar), potassium permanganate, sodium bisulfite, sodium hydroxide, acetic acid, and hydrogen peroxide
Exposure Routes:	Potential-Soil
Exposed Populations:	Potential-residents within immediate area (less than 300 feet)
Health Effects:	Potential Adverse Health Effects-"low" for residents within immediate area
Environmental	
Consequences:	Contaminated soil confined to catch basin area
Legal Liability:	Potential-Level and Extent: "Low" potential for legal liability
Cost Remediation/	
Removal Actions	Investigation Project, Initial Phase II ESA-estimated to cost \$20,000
Response Actions:	Limited soil and groundwater sampling. Sampling may indicate other actions needed.

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## **APPENDICES**

Appendix A	Index Map, Site Map, Site Photographs, and Aerial Photographs
Appendix B	Environmental Database Search Conducted by Environmental Data Resources, Inc.
Appendix C	Local Permits and Registrations
Appendix D	State and Local Agency Reports and Data
Appendix E	Chemicals and Substances List Material Safety Data Sheet Information
Appendix F	Tecumseh Professional Associates, Inc. Site Assessment Team Qualifications
Appendix G	Site Health and Safety Plan

**PHASE I ENVIRONMENTAL SITE ASSESSMENT  
5115 AND 5169 EL PASO DRIVE  
EL PASO, TEXAS 79905  
JUNE 24, 2002**

**1.0 INTRODUCTION**

The United States Army Corps of Engineers (USACE) and the City of El Paso, Texas retained Tecumseh Professional Associates, Inc. (Tecumseh) to perform a Phase I Environmental Site Assessment (ESA) on two contiguous properties located within the City of El Paso, Texas. The addresses of the properties are 5115 and 5169 El Paso Drive and are referred to as the Subject Site throughout the remainder of this report. When a discussion is specific to one of the addresses then the property will be identified by that address.

The objective of this Phase I ESA is to provide information that will aid in identifying recognized environmental conditions that exist from the release of hazardous or toxic materials, both on the Subject Site and in the immediate vicinity of the Subject Site. Recognized environmental conditions are defined by the American Society for Testing and Materials (ASTM) as:

“ . . . the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include *de minimus* conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies” (ASTM, 2000).

This Phase I ESA utilizes the ASTM “Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process” (Designation E 1527) (ASTM, 2000), and acceptable industry standards as guides for investigating and reporting on the environmental condition of the Subject Site. The findings conveyed in this report are based on information obtained from a variety of sources referenced in this document. Although every effort has been made to provide accurate, correct data, Tecumseh cannot guarantee the authenticity or reliability of the information provided by others.

This Phase I ESA has been prepared for use by and can only be relied upon by the USACE and the City of El Paso, Texas. This Phase I ESA is to be used at the discretion of the USACE and the City of El Paso. This document shall be taken in its whole and shall not be transferred to any other party without the expressed written authorization of the USACE and the City of El Paso.



## 2.0 SCOPE OF WORK

The purpose of the Phase I ESA is to observe current site conditions and evaluate the potential for general and specific environmental hazards or toxic substance contamination associated with the property. The scope of work for the ESA includes:

- A visual inspection of the Subject Site and surrounding area
- Acquisition of relevant data and documentation from appropriate individuals and governmental agencies
- A search of relevant environmental databases
- Preparation of this report

Relevant data and documentation from municipal and state sources were obtained when available. Additional information about the environmental condition of the Subject Site was collected from appropriate historical references and agencies. This report is not a comprehensive site characterization. This report is based on findings derived from a site reconnaissance, review of applicable regulatory records and sources, and comments made by interviewees. The findings herein do not guarantee that hazardous materials do not exist on the Subject Site.

Additional documentation is provided in:

- Appendix A. This Appendix contains the Index map, two Site Maps, Site Photographs, and Aerial Photographs
- Appendix B. This Appendix contains the environmental database search conducted by Environmental Data Resources, Inc. (EDR). The EDR report includes maps that show documented locations of environmental concern present in the site vicinity.
- Appendix C. This Appendix contains Local Permits and Registrations
- Appendix D. This Appendix contains the State and Local Agency Reports and Data
- Appendix E. This Appendix contains the Chemicals and Substances List and Material Safety Data Sheet Information
- Appendix F. This Appendix contains Tecumseh Site Assessment Team Qualifications
- Appendix G. This Appendix contains the Site Health and Safety Plan

### **3.0 SITE DESCRIPTION**

#### **3.1 Site Location and Legal Description**

The Subject Site is located in the west-central portion of the City of El Paso, Texas, less than a quarter mile northwest from the intersection of Alameda Avenue and Paisano Street, the nearest major thoroughfare intersection. The addresses for the two contiguous parcels are 5115 and 5169 El Paso Drive, El Paso, Texas 79905. Parcel 5115 El Paso Drive is 4.72 acres (205,603 square feet) comprised of Tracts 26A, 26B, 26B2, 26C, 27A, 27A1 and 27A2 Elijah Bennett Survey No. 11, an addition to the City of El Paso, El Paso County, Texas. The center of 5115 El Paso Drive is located at 31° 46.289' north latitude, and 106° 25.77' west longitude. Parcel 5169 El Paso Drive is 0.55 acres (23,958 square feet) comprised of Lots 3 through 10, inclusive, Block 1, Hadlock's Suburban Gardens, an addition to the City of El Paso, El Paso County, Texas. The center of 5169 El Paso Drive is located at 31° 46.248' north latitude, and 106° 25.726' west longitude.

The Subject Site is found on U.S. Geological Survey (USGS) El Paso, Texas 7.5-minute series topographic map, 1997, at an elevation of 3,698 feet above mean sea level. The Subject Site is bordered on the east by Colfax Street, on the north by private residences and a fenced yard used to store wood pallets owned by Foster Investment Corporation, on the west by developed and undeveloped land belonging to Texas Tech University Health Sciences Center, and on the south by El Paso Drive. The main access into the Subject Site consists of driveways reached from El Paso Drive. An index map, two site maps, site photographs, and aerial photographs are provided in Appendix A.

#### **3.2 Geology**

The Subject Site is located within the Basin and Range physiographic province of West Texas. The geological framework of the El Paso area is primarily controlled by the Rio Grande Rift, which resulted in a series of bolsons, or down-dropped basins (grabens), and bounding uplands. The rocks of the uplands were the source materials for the Tertiary and Quaternary alluvial sediments that fill the basins and are referred to as bolson deposits (TWC, 1991). From youngest to oldest, the geologic units nearest to the surface at the Subject Site include the Quaternary-age Rio Grande alluvium and the Tertiary-age Hueco Bolson deposits.

The Rio Grande alluvium is composed of unconsolidated, alternating, and discontinuous beds of silt, clay, sand, gravel, and boulders. The alluvial sediments originate from sediments deposition by stream (alluvium deposits), by wind (eolian deposits), and in playa-type lakes (lacustrine deposits). Minor amounts of caliche, gypsum, conglomerate, volcanic ash, tuffs, and basalts are also found with these sediments. The Rio Grande alluvium, which reaches a thickness of about 200 feet, overlies the Hueco Bolson deposits.

The Hueco Bolson deposits underlie the Rio Grande alluvium and consist of alternating beds of clay, sand, and gravel. The individual beds have a non-uniform character and range in thickness from a fraction of an inch to approximately 100 feet (TDWR, 1979). The Hueco Bolson is approximately 50 miles long and 15.5 miles at the maximum width. The bolson is bounded on the west by the Franklin Mountains and on the east by the Hueco Mountains. The Tularosa Basin and the Quitman-Sierra Blanca Mountains bound the bolson to the north and south. The bolson deposits can be up to approximately 9,000 feet in thickness (TDWR, 1979).

### 3.3 Hydrogeology

The aquifer system identified in the general area of the Subject Site is referred to as the Hueco Bolson aquifer system. This system is composed of Tertiary- to Quaternary-age water-bearing alluvium and bolson deposits scattered throughout many areas of the state. Even though these sediments are considered separate geological units, they are generally considered one major aquifer because of their geological and hydrological similarities. This aquifer system includes water-bearing zones in both the Rio Grande alluvium and the Hueco Bolson deposits.

The Rio Grande alluvium aquifer is considered an important source of shallow groundwater for supplemental irrigation when the surface water flow in the Rio Grande is not sufficient to meet the total agricultural needs of the area farmers. Well yields range from 25 to over 3,000 gallons per minute (gpm), with the majority of wells yielding greater than 1,000 gpm (TDWR, 1979). The shallowest depth to groundwater produced from this aquifer is approximately 50 feet below the ground surface. Depths to ground water in this aquifer range from about 350 feet near pumping centers to less than 100 feet elsewhere. The Hueco Basin contains freshwater at depths as great as 1,200 feet (TDWR, 1979).

Overproduction of water from the Hueco Bolson aquifer has increased the threat of vertical and lateral saline water encroachment into freshwater-bearing zones (TWC, 1991). Recharge to the Hueco Bolson aquifer is poorer quality principally from the precipitation runoff from the Franklin Mountains west of the Subject Site and at times locally along the Rio Grande. Discharge from the bolson occurs as groundwater seeps into overlying Rio Grande alluvium aquifer and also by pumping.

There are 28 water wells identified in the state database well information system and 6 water wells identified in the federal USGS well information system within the one-mile search radius (EDR, 2002). The individual well types were not specified in the EDR report. Below are tables that include vital well data for the 34 water wells identified in the EDR report.

#### Federal USGS Well Information

Map ID	Well ID	Location from Subject Site	Well Depth	Date Drilled
A4	314609106260901	¼-½ mile WSW	N/A	N/A
B9	314541106253801	½-1 mile South	N/A	N/A
D17	314653106253103	½-1 mile NNE	N/A	N/A
E19	314650106261101	½-1 mile NW	N/A	N/A
G24	314627106263501	½-1 mile WNW	N/A	N/A
H30	314609106244501	½-1 mile East	N/A	N/A

#### State Database Well Information

Map ID	Well ID	Location from Subject Site	Well Depth (feet)	Date Drilled
1	B4913845	¼-½ mile SSE	130	N/A
A2	B4913802	¼-½ mile WSW	90	1952
A3	B4913806	¼-½ mile WSW	643	1938
A5	S004187	¼-½ mile West	788	1975
A6	B4913830	¼-½ mile WSW	788	1975
7	B49113821	½-1 mile East	53	1967
B8	S004214	½-1 mile South	872	1975
C10	B4913827	½-1 mile WNW	225	1974
B11	B4913811	½-1 mile South	50	1968

Map ID	Well ID	Location from Subject Site	Well Depth (feet)	Date Drilled
B12	B4913831	½-1 mile South	872	1975
C13	B4913818	½-1 mile WNW	150	1946
14	B4913822	½-1 mile SE	801	1956
D15	B4913805	½-1 mile NNE	862	1922
D16	B4913810	½-1 mile NNE	752	1964
E18	B4913804	½-1 mile NW	882	1924
F20	S004279	½-1 mile SW	866	1976
F21	B4913834	½-1 mile SW	866	1978
G22	B4913814	½-1 mile WNW	160	1968
G23	B4913813	½-1 mile WNW	51	1967
H25	B4913944	½-1 mile East	99	1984
H26	B4913946	½-1 mile East	N/A	1984
H27	B4913948	½-1 mile East	107	1984
H28	B4913947	½-1 mile East	20	1984
H29	B4913945	½-1 mile ESE	130	1988
H31	B4913949	½-1 mile East	620	1984
I32	B4913817	½-1 mile NNW	860	1918
I33	B4913809	½-1 mile NNW	856	1922
34	B4913938	½-1 mile ENE	215	1976

The Subject Site is located in the Rio Grande Basin. The Rio Grande originates in southern Colorado, flows southerly across New Mexico, and enters Texas approximately 20 miles northwest of El Paso. This river forms the international boundary between the United States and Mexico from El Paso to the Gulf of Mexico. The total basin drainage area is 137,227 square miles, of which 88,968 square miles is in the United States and 48,259 square miles is in Texas. Most of the flow of the Rio Grande is diverted for irrigation and municipal purposes before it reaches El Paso. Downstream of El Paso, most of the flow consists of treated municipal wastewater from El Paso and irrigation return flow. The primary use of the Rio Grande in the El Paso area is for irrigation. The Rio Grande provided over 65% of the water needed for the El Paso area irrigation during the years 1960-1990 (TWQI, 1990). Storm water at the Subject Site that is not collected in one of two on-site pits flows for approximately 1.2 miles south before entering the Rio Grande (Flores, 2002). Review of the Federal Emergency Management Agency (FEMA) flood insurance maps indicated that the Subject Site is not within the 500-year floodplain.

Information obtained from Mr. Antonio Flores with the City of El Paso and from water well data provided in the EDR report reveal that depth to ground water can be as shallow as 50 feet below the ground surface. Mr. Flores and Mr. Sergio Guerrero, Brownfields Coordinator with the Rio Grande Council of Governments (RGCG) mentioned during conversations with Tecumseh on May 31 and June 12, 2002 respectively, that groundwater flow direction in the area of the Subject Site is from south to north. The interpreted groundwater flow direction was determined from numerous groundwater studies in the area initiated by Leaking Underground Storage Tank (LUST) sites that are within a one-mile radius of the Subject Site. The south to north groundwater flow direction is used in this Phase I ESA Report to identify which environmental sites in the EDR report are hydrogeologically up gradient, down gradient, or side gradient in relation to the Subject Site.

### **3.4 Adjacent Properties**

The Subject Site is bordered on the east by Colfax Street and across Colfax Street by 5201 El Paso Drive, Ameri-Tech Distribution Inc., a garment manufacturing facility; on the north by private residences and a fenced yard used to store wood pallets owned by Foster Investment Corporation; on the west by developed and undeveloped land belonging to Texas Tech University Health Sciences Center, and a portion of which is the site of the former Del Camino Motel; and on the south by El Paso Drive. An individual homestead or residence is located between a portion of 5115 and 5169 El Paso Drive. The homestead is addressed 5159 El Paso Drive. There are three businesses located south of the Subject Site across El Paso Drive. Located at 5100 El Paso Drive is the office of the Texas Agricultural Extension Service of the Texas A & M University System; at 5150 El Paso Drive is the office of the Texas Department of Human Services; and at 5160 El Paso Drive is the office of the Inner Resource Recovery Clinic. Southwest of the Subject Site across El Paso Drive, located at 5003 El Paso Drive is a former automobile service station. The service station now abandoned contained gasoline filled underground storage tanks (USTs) that were removed. This site at 5003 El Paso Drive is identified in the EDR report as map ID C7. Photographs of the Subject Site and adjacent properties are presented in Appendix A.

## **4.0 SITE HISTORY**

### **4.1 Ownership History**

#### **5115 El Paso Drive**

A chain-of-title analysis was conducted by Lawyers Title of El Paso, Texas to determine the property ownership during the last 50 years (MMS, 1991). This property was transferred from A. B. Poe to R. L. Alexander on February 14, 1940 and remained in the Alexander family until 1961 when Joe Chemall made acquisition of a portion, and William Farah acquired a portion. Joe Chemall passed title to Viola Sportswear, Inc. in 1979. Midwestern Life Insurance Company acquired the property's title in 1989, but transferred it to Mitchell and Sue Brasington within the month. The present owner is Mitchell R. Brasington, individually and trustee to the Sue Haney Brasington Testamentary Trust. Millennium Plastics Technologies, LLC leases the property from Mr. Brasington.

#### **5169 El Paso Drive**

It appears that this property had the same chain-of-title as 5115 El Paso Drive through July 16, 1997 when Mitchell R. Brasington sold the property via deed to Chung F. Tse and Chen M. Tse. The present owner is Chen M. Tse, individually and as independent executor to the estate of Chung F. Tse deceased.

### **4.2 Aerial Photographs**

Six aerial photographs of the Subject Site were reviewed for this Phase I ESA. Photocopies of the aerial photographs are presented in Appendix A. The date, scale, and an interpretation of the photographs are presented below:

- 1956 Scale: 1 inch = 300 feet  
Prominent features include El Paso Drive, Alameda Avenue, Colfax Street, and the Del Camino Motel in full operation. 5169 El Paso Drive appears to be developed as a parking lot with vacant land to the north. 5115 El Paso Drive contains a building that may be a private residence with numerous trees. There are other buildings or structures located north and west of 5115 El Paso Drive. The buildings could be a part of the Del Camino Motel.
- 1960 Scale: 1 inch = 300 feet  
Prominent features include El Paso Drive, Alameda Avenue, Colfax Street, and the Del Camino Motel. 5169 El Paso Drive appears to be developed with two small buildings and 5115 El Paso Drive contains a building that appears to be a private residence with numerous trees. The other buildings or structures located north and west of 5115 El Paso Drive still appear in this photograph.
- 1965 Scale: 1 inch = 300 feet  
Prominent features include El Paso Drive, Alameda Avenue, Colfax Street, and the Del Camino Motel. 5169 El Paso Drive appears to be a vacant lot although the contrast of this photograph is very light and known existing structures appear as outlines only. 5115 El Paso Drive appears as it did in the 1960 and 1956 photographs.
- November 1973 Scale: 1 inch = 300 feet  
Prominent features include El Paso Drive, Alameda Avenue, Colfax Street, and the Del Camino Motel. 5169 El Paso Drive appears to be a vacant lot with some vegetation covering a portion of the property.

*5115 and 5169 El Paso Drive  
El Paso, Texas 79905*

*Phase I Environmental Site Assessment  
Tecumseh Professional Associates, Inc.*

The individual homestead or residence located between a portion of 5115 and 5169 appears in this photograph. 5115 El Paso Drive is a vacant lot that appears to have been recently cleared because the property is completely free of vegetation. The property is cleared from El Paso Drive north 1,100 feet to the Texas and Pacific railroad tracks. The building that is located at 5201 El Paso Drive that operates today as Ameri-Tech Distribution Inc., located east and across Colfax Street from 5169 El Paso Drive appears in this photograph.

- March 27, 1979 Scale: 1 inch = 300 feet  
Prominent features include El Paso Drive, Alameda Avenue, Colfax Street, and the Del Camino Motel. Both properties appear as they did in the 1973 photograph.
- January 1986 Scale: 1 inch = 200 feet  
Prominent features include El Paso Drive, Alameda Avenue, Colfax Street, and the Del Camino Motel. Today both properties appear as they did in the 1973 photograph with a few differences. At 5115 El Paso Drive, the semi-truck/trailer parking lot and storm water catch basin, both located north of the warehouse building, and the detached metal building that holds the air compressor equipment located on the east side of the warehouse building do not appear in this photograph. This photograph reveals no above ground storage tanks (ASTs) at this parcel. Also at 5169 El Paso Drive, the portion of the building that contains office space has not yet been constructed nor has the attached metal building addition located on the northwest side of the original building. This photograph reveals no ASTs at this parcel.

#### **4.3 Current Ownership and Occupancy**

The present owner of 5115 El Paso Drive is Mitchell R. Brasington individually and trustee to the Sue Haney Brasington Testamentary Trust. Millennium Plastics Technologies, LLC leases the property from Mr. Brasington. The present owner of 5169 El Paso Drive is Chen M. Tse, individually and as independent executor to the estate of Chung F. Tse deceased.

On the day of the site visit, the property at 5169 El Paso Drive had been vacated and only contained a few pieces of equipment. The property at 5115 was also in the process of being vacated by Millennium Plastics Technologies, LLC and all that remained at the property were numerous small pieces of equipment.

## 5.0 REGULATORY REVIEW

The following discussions are based upon the EDR report, visual observations, and information obtained from personal interviews with representatives of the City of El Paso, the Texas Natural Resource Conservation Commission (TNRCC), the County of El Paso, the RGCG, the vice president of Millennium Plastics Technologies, LLC, the realtor, and the appraiser of the properties. The search radius identified in each database discussion indicates the radial distance from the approximate center of the Subject Site for which the specific database was reviewed. The Subject Site is designated with a “star” symbol on the EDR radius maps.

The City of El Paso and Mr. Sergio Guerrero, Brownfields Coordinator with the RGCG provided additional information for the preparation of this report. The City of El Paso provided previous Phase I assessments of the Subject Site that included limited sampling data, and title information. The RGCG shared all their files regarding Brownfields sites in the immediate area of the Subject Site. Tecumseh reviewed all the RGCG files and requested that some files be photocopied for future use.

Mr. Flores and Mr. Guerrero mentioned during conversations with Tecumseh on May 31 and June 12, 2002 respectively, that groundwater flow direction in the area of the Subject Site is from south to north. The interpreted groundwater flow direction was determined from numerous groundwater studies in the area initiated by LUST sites that are within a one-mile radius of the Subject Site. The south-north groundwater flow direction is used in this Phase I ESA Report to identify which environmental sites in the EDR report are hydrogeologically up gradient, down gradient, or side gradient in relation to the Subject Site. Mr. Flores and Mr. Guerrero also mentioned a 4-inch diameter diesel fuel pipeline located approximately 150 feet north from a portion of the Subject Site that parallels the railroad tracks.

### 5.1 Comprehensive Environmental Response, Compensation and Liability Act/National Priorities List

*The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), also referred to as Superfund, provides for identification, clean up, compensation, and assignment of liability for releases of hazardous substances into the air, land or water. A CERCLA facility is one that has been placed on the Federal database (Comprehensive Environmental Response, Compensation, and Liability Information System or CERCLIS) of abandoned or inactive facilities. Inclusion on this list indicates that contamination has been identified at the site. ASTM required search radius: 1.0 mile.*

There are no CERCLA sites within 1 mile of the Subject Site according to the EDR report.

*The National Priorities List (NPL) is a listing of CERCLA sites that have the highest priority for cleanup pursuant to the Environmental Protection Agency's (EPA's) Hazard Ranking System (HRS) and pose inherent or immediate risk to human health and the environment. The HRS is EPA's principal screening tool used to evaluate risks to public health and the environment associated with abandoned or uncontrolled hazardous waste sites. ASTM required search radius: 1.0 mile.*

There are no NPL sites within 1 mile of the Subject Site according to the EDR report.



## 5.2 Resource Conservation and Recovery Act

*The Resource Conservation and Recovery Act of 1976 (RCRA) gave EPA the authority to govern hazardous waste generation, treatment, storage, transport, and disposal from “cradle-to-grave.” A RCRA-listed facility generates or handles chemicals that are listed as hazardous under RCRA [40 Code of Federal Regulations (CFR) 261, Parts C and D]. A RCRA listing does not indicate a release from the facility. ASTM required search radius: 1 mile for RCRA corrective action (CORRACTS) TSD facilities, 0.5 mile for non-CORRACTS TSD facilities.*

There are no RCRA CORRACTS sites within 1 mile of the Subject Site according to the EDR report.

There are seven RCRA Generator sites, denoted in the EDR report as Resource Conservation and Recovery Information System (RCRIS) generator sites, within 0.25 miles of the Subject Site. For additional information regarding the RCRIS Generator sites see the EDR report presented in Appendix B. A description of the RCRIS generator sites, 2-Large Quantity Generator (LQG) sites, and 5-Small Quantity Generator (SQG) sites is provided below:

1. EDR Map ID #: 1. EPA ID #: TXD988058772. Status: LQG. This site is located less than 0.125 miles east-southeast of the Subject Site. The site name is Wells Lamont Corp., 5200 El Paso Drive, El Paso, Texas 79905. This site is located topographically flat and hydrogeologically side gradient from the Subject Site. Violation Status: No violations found.
2. EDR Map ID #: E18. EPA ID #: TXD981902893. Status: LQG. This site is located less than 0.25 miles northwest of the Subject Site. The site name is Taylor Instrument, located at 301 North Concepcion Street, El Paso, Texas 79905. This site is located topographically up gradient and hydrogeologically down gradient from the Subject Site. Violation Status: There are 2 violation records reported at this site. Area of Violation: Generator-Other Requirements.
3. EDR Map ID #: A3. EPA ID #: TXD195664586. Status: SQG. This site is located between 0.125 – 0.25 miles east of the Subject Site. The site name is Med Compliance Services Stericycle, located at 5307 El Paso Drive, Texas 79905. This site is located topographically flat and hydrogeologically side gradient from the Subject Site. Violation Status: No violations found.
4. EDR Map ID #: A4. EPA ID #: TXD987981735. Status: SQG. The site is located between 0.125 – 0.25 miles east of the Subject Site. The site name is Meribah Corporation, located at 5309 El Paso Drive, El Paso, Texas 79905. This site is located topographically flat and hydrogeologically side gradient from the Subject Site. Violation Status: No violations found.
5. EDR Map ID #: B5. EPA ID #: TXD0180000010. Status: SQG. The site is located between 0.125 – 0.25 miles southeast of the Subject Site. The site name is U.S. Postal Service El Paso, located at 5300 Paisano Drive, El Paso, Texas 79905. This site is located topographically down gradient and hydrogeologically up gradient from the Subject Site. Violation Status: No violations found.
6. EDR Map ID #: D11. EPA ID #: TXD0000765693. Status: SQG. The site is located between 0.125 – 0.25 miles southeast of the Subject Site. The site name is X-Pert Body Craft, located at 157 Cebada Street, El Paso, Texas 79905. This site is located topographically down gradient and hydrogeologically up gradient from the Subject Site. Violation Status: No violations found.

7. EDR Map ID #: D12. EPA ID #: TXD981612310. Status: SQG. The site is located between 0.125 – 0.25 miles southeast of the Subject Site. The site name is Vowell Construction Company, located at 1 McKellington Canyon Road, El Paso, Texas 79905. This site is located topographically down gradient and hydrogeologically up gradient from the Subject Site. Violation Status: No violations found.

A RCRA listing does not indicate a release from the facility. There is no evidence of environmental impacts from any of these sites to the Subject Site.

### **5.3 Emergency Response Notification System (ERNS)**

*The ERNS is a database used to store information on notifications of oil discharges and hazardous substance releases. The ERNS program is a cooperative data sharing effort among the EPA Headquarters, the Department of Transportation (DOT) Research and Special Programs Administration's (RSPA) John A. Volpe National Transportation Systems Center, other DOT program offices, the ten EPA Regions, and the National Response Center. The ERNS provides the most comprehensive data compiled on notifications of oil discharges and hazardous substance releases in the United States.*

The Subject Site is not identified as an ERNS site in the EDR report. The ASTM required search distance is for the target property only.

### **5.4 Underground Storage Tanks**

*Underground storage tanks (USTs) store regulated substances and have at least 10 percent of their volume, including contents of associated pipes, underground. The UST database contains USTs. USTs are regulated under Subtitle I of the RCRA. The data comes from the TNRCC's Petroleum Storage Tank Database. ASTM required search radius: 0.25 miles.*

#### **On-Site USTs**

There is one open top concrete tank located at 5169 El Paso Drive. The tank is outside and adjacent to the building at the northeast corner of the property. The tank appears to be a pre-treatment facility for effluent generated from the former operation. The tank has approximately one-half to two-thirds of its volume below the ground surface. The tank is equipped with a series of copper pipe coils around its interior circumference and multiple inlet pipes and a discharge pipe situated in a higher position than the inlet pipes at the opposite end of the tank. The copper piping inside the tank and all the steel hardware on the tank is very corroded. The discharge pipe appears to connect to the City of El Paso sewer system as evidenced by multiple manhole covers in a concrete lined basin that is in alignment with the discharge pipe. On the day of the site visit, approximately one third of the tank volume contained fluid that appeared to be wastewater with an oil skim floating on the surface. The tank and the entire area around the tank emitted a strong chemical odor.

This tank does not appear to be registered with any agency, local, state, or federal entity.

## Off-Site USTs

1. EDR Map ID #: B6. Facility ID: 0010933. Number of tanks: 3. The site is located 0.189 miles southeast of the Subject Site. Site Name: Vehicle Maintenance Facility. Location: 5300 Paisano Drive, El Paso, Texas 79905. Owner: U.S. Postal Service, One Post Office Drive, San Antonio, Texas 78284. Contact Name: Antonio Hernandez. Tank Status: Removed from ground. This UST site is located topographically down gradient and hydrogeologically up gradient from the Subject Site.
2. EDR Map ID #: C7. Facility ID: 0055184. Number of tanks: 4. The site is located 0.189 miles west-southeast of the Subject Site. Site Name: Martinez Mechanic Shop. Location: 5001 & 5003 Alameda Avenue, El Paso, Texas 79905. Owner/Responsible Party: University of Texas System, 210 W. 6<sup>th</sup> Street, Austin, Texas 78701. Contact Name: M. E. Cook. Tank Status: Removed from ground. This UST site is located topographically side gradient and hydrogeologically up gradient from the Subject Site.
3. EDR Map ID #: C8. Facility ID: 0014979. Number of tanks: 1. The site is located 0.189 miles west-southeast of the Subject Site. Site Name: Del Camino Cleaners. Location: 106 S. Concepcion, El Paso, Texas 79905. Owner/Responsible Party: Rodolfo De La Rosa, 11768 Angelica Ct., El Paso, Texas 79936. Contact Name: Rodolfo De La Rosa. Tank Status: Removed from ground. This UST site is located topographically side gradient and hydrogeologically up gradient from the Subject Site.
4. EDR Map ID #: 9. Facility ID: 0036011. Number of tanks: 1. The site is located 0.18 miles east of the Subject Site. Site Name: Fruehauf Division Fruehauf Corporation. Location: 5353 El Paso Drive, El Paso, Texas 79905. Owner/Responsible Party: JOS Enterprises LTD, 5309 EL Paso Drive, El Paso, Texas 79905. Contact Name: Ron Acton. Tank Status: In use. This UST site is located topographically side gradient and hydrogeologically side gradient from the Subject Site.
5. EDR Map ID #: 10. Facility ID: 0042945. Number of tanks: 1. The site is located 0.1875 miles west-northwest of the Subject Site. Site Name: AT&T-IS. Location: 200 N. Concepcion, El Paso, Texas 79905. Owner/Responsible Party: AT&T Communications Inc., 900 Route 202-206 N Room 5C106 E, Bedminster, NJ 07921. Contact Name: Cecilia Scopel. Tank Status: Permanently filled in-place. This UST site is located topographically up gradient and hydrogeologically side gradient from the Subject Site.
6. EDR Map ID #: 13. Facility ID: 0057490. Number of tanks: 2. The site is located 0.2 miles west-southwest of the Subject Site. Site Name: Body Pros. Location: 4921 Alameda, El Paso, Texas 79905. Owner/Responsible Party: John Gonzalez, 4031 Van Buren Ave, El Paso, Texas 79930. Contact Name: John Gonzalez. Tank Status: In use. This UST site is located topographically side gradient and hydrogeologically side gradient from the Subject Site.
7. EDR Map ID #: 14. Facility ID: 0057886. Number of tanks: 4. The site is located 0.20 miles east-northeast of the Subject Site. Site Name: Passage Supple Company. Location: 143 Chelsea Street, El Paso, Texas 79905. Owner/Responsible Party: L.R. Paschich, 200 Chelsea Street, El Paso, Texas 79905. Contact Name: L.R. Paschich. Tank Status: All tanks removed from ground. This UST site is located topographically side gradient and hydrogeologically side gradient from the Subject Site.
8. EDR Map ID #: 15. Facility ID: 0023258. Number of tanks: 4. The site is located 0.23 miles southwest of the Subject Site. Site Name: Unknown. Location: 5000 East Paisano Drive, El Paso,

Texas 79905. Owner/Responsible Party: Jesus Casas, 5000 East Paisano Drive, El Paso, Texas 79905. Contact Name: Jesus Casas. Tank Status: All tanks are temporarily out of use. This UST site is located topographically down gradient and hydrogeologically up gradient from the Subject Site.

9. EDR Map ID #: 16. Facility ID: 0043334. Number of tanks: 2. The site is located 0.23 miles west-northwest of the Subject Site. Site Name: Lift Truck Service. Location: 206 Raynolds, El Paso, Texas 79905. Owner/Responsible Party: Lawrence S. Waltzer, 10016 Odessa, El Paso, Texas 79924. Contact Name: Lawrence S. Waltzer. Tank Status: All tanks removed from ground. This UST site is located topographically up gradient and hydrogeologically down gradient from the Subject Site.
10. EDR Map ID #: E17. Facility ID: 0031225. Number of tanks: 1. The site is located 0.245 miles northwest of the Subject Site. Site Name: Swift Eckrich Inc. Location: 300 Concepcion, El Paso, Texas 79905. Owner/Responsible Party: Swift Eckrich Inc., 130 Town East Blvd, Mesquite, Texas 75149. Contact Name: Sandra Burritt. Tank Status: Removed from ground. This UST site is located topographically up gradient and hydrogeologically down gradient from the Subject Site.

There is no evidence of environmental impacts to the Subject Site from any of these UST sites.

## **5.5 Leaking Underground Storage Tanks (LUST)**

*The Leaking UST Tank Incident Reports contain an inventory of reported LUST incidents. The data comes from the TNRCC's Leaking Petroleum Storage Tank Database. ASTM required search radius: 0.5 miles.*

### **On-Site LUSTs**

The EDR report did not identify any LUSTs on the Subject Site.

### **Off-Site LUSTs**

The EDR report identified nine LUST sites within 0.5 miles of the Subject Site. Specific information regarding these 9 LUST sites are provided below:

1. EDR Map ID #: B6. Facility ID: 0010933. LPST ID: 091103. The site is located 0.189 miles southeast of the Subject Site. Site Name: Vehicle Maintenance Facility. Location: 5300 Paisano Drive, El Paso, Texas 79905. Owner: U.S. Postal Service, P.O. Box 667180, Dallas, Texas 78266. Contact Name: Ron Helmedag. Priority: Ground water impact, public water supply well within 0.25-0.5 miles. Status: Final concurrence issued, case closed. This LUST site is located topographically down gradient and hydrogeologically up gradient from the Subject Site.
2. EDR Map ID #: C7. Facility ID: 0055184. LPST ID: 092089. The site is located 0.189 miles west-southwest of the Subject Site. Site Name: Martinez Mechanic Shop. Location: 5001 & 5003 Alameda Avenue, El Paso, Texas 79905. Owner/Responsible Party: University of Texas System, 210 W. 6<sup>th</sup> Street, Austin, Texas 78701. Contact Name: James Wilson. Priority: Groundwater impact, public water supply well within 0.25-0.5 miles. Status: Final concurrence issued, case closed. This LUST site is located topographically side gradient and hydrogeologically up gradient from the Subject Site.

3. EDR Map ID #: 14. Facility ID: 0057886. LPST ID: 0057886. The site is located 0.20 miles east-northeast of the Subject Site. Site Name: Passage Supple Company. Location: 143 Chelsea Street, El Paso, Texas 79905. Owner/Responsible Party: L.R. Paschich, 143 Chelsea Street, El Paso, Texas 79905. Contact Name: L.R. Paschich. Priority: Assessment incomplete, no apparent threats or impacts to receptors. Status: Site Assessment. This LUST site is located topographically side gradient and hydrogeologically side gradient from the Subject Site.
4. EDR Map ID #: 19. Facility ID: 0023801. LPST ID: 112097. The site is located 0.28 miles east-northeast of the Subject Site. Site Name: Dickshire Distributing. Location: 203 N. Chelsea Street, El Paso, Texas 79905. Owner/Responsible Party: Sun City Beverages, Inc., P.O. Box 10073 El Paso, Texas 79905. Contact Name: Jeanette Valenzuela. Priority: No groundwater impact, no apparent threats or impacts to receptors. Status: Final concurrence pending documentation of well plugging. This LUST site is located topographically side gradient and hydrogeologically side gradient from the Subject Site.
5. EDR Map ID #: 21. Facility ID: 0034490. LPST ID: 115299. The site is located 0.31 miles southeast of the Subject Site. Site Name: Santos Enterprises. Location: 5400 Alameda Avenue, El Paso, Texas 79905. Owner/Responsible Party: Santos Enterprises, 5400 Alameda Avenue, El Paso, Texas 79905. Contact Name: Stanley Santos. Priority: Groundwater impact, no apparent threats or impacts to receptors. Status: Pre-assessment/release determination. This LUST site is located topographically down gradient and hydrogeologically up gradient from the Subject Site.
6. EDR Map ID #: 22. Facility ID: 0021293. LPST ID: 094866. The site is located 0.375 miles northwest of the Subject Site. Site Name: Pepsi Cola Bottling Company El Paso. Location: 401 Raynolds Avenue, El Paso, Texas 79905. Owner/Responsible Party: Pepsi Cola, 401 Raynolds Avenue, El Paso, Texas 77905. Contact Name: Jim Larabel. Priority: Soil contamination only, requires full site assessment & RAP. Status: Final concurrence issued, case closed. This LUST site is located topographically up gradient and hydrogeologically down gradient from the Subject Site.
7. EDR Map ID #: 23. Facility ID: 0046762. LPST ID: 092236. The site is located 0.375 miles east-southeast of the Subject Site. Site Name: Fox Plaza Shopping Center. Location: 5547 Alameda Avenue, El Paso, Texas 79905. Owner/Responsible Party: Marina International Properties, 444 Washington Street, Marina Del Ray, CA 90292. Contact Name: Edward Castillo. Priority: Groundwater impacted, no apparent threats or impacts to receptors. Status: Final concurrence pending documentation of well plugging. This LUST site is located topographically down gradient and hydrogeologically up gradient from the Subject Site.
8. EDR Map ID #: 24. Facility ID: 0007280. LPST ID: 107848. The site is located 0.38 miles east-southeast of the Subject Site. Site Name: 7 Eleven 57630. Location: 5600 Alameda Avenue, El Paso, Texas 79905. Owner/Responsible Party: Southland Corp., P.O. Box 711, Dallas, Texas 75221. Contact Name: Ken Hilliard. Priority: Groundwater impacted, no apparent threats or impacts to receptors. Status: Final concurrence issued, case closed. This LUST site is located topographically down gradient and hydrogeologically up gradient from the Subject Site.
9. EDR Map ID #: 25. Facility ID: 0038632. LPST ID: 104388. The site is located 0.45 miles north-northwest of the Subject Site. Site Name: Raynolds Gulf. Location: 4900 East Gateway, El Paso, Texas 79905. Owner/Responsible Party: Ritchie Distributing Company, 4700 Duranzo, El Paso, Texas 79905. Contact Name: Joani Eaves. Priority: no groundwater impact, no apparent threats or

impacts to receptors. Status: Final concurrence issued, case closed. This LUST site is located topographically up gradient and hydrogeologically down gradient from the Subject Site.

There are 5 LUST sites (EDR map # B6, #C7, #21, #23, and #24) that are hydrogeologically up gradient to the Subject Site. There is no evidence of environmental impacts to the Subject Site from any of these LUST sites.

## **5.6 Solid Waste Facilities/Landfills (SWF/LF)**

*The Solid Waste Facilities/Landfill Sites records contain an inventory of solid waste disposal facilities or landfills in a particular state. The data comes from the TNRCC's permitted Solid Waste Facilities list. ASTM required search radius: 0.5 miles.*

There is one SWF/LF site identified in the EDR report. Information regarding the SWF/LF site is presented below.

EDR Map ID #: A2. Facility ID #: 40094. EDR ID #: S105243645. The site is located 0.13 miles east of the Subject Site. Site Name: Not reported. Location: 5307 El Paso Drive, north of El Paso Drive between Chelsea/EU El Paso, Texas. Owner: JOS Enterprises, LTD, P.O. Box 26903, El Paso, Texas 79926. Tons Per Day: 20 Removal Status: Med. Waste Transfer Facility. Status Date: 05/30/1996. Facility Status: Proposed Site. Applicants Name: Medical Compliance Services. Applicants Address: 5307 El Paso Drive EL Paso, Texas 79905. Permit Status: Permit Issued. Facility Type: Miscellaneous Solid Waste Processing Facility. This SWF/LF site is located topographically side gradient and hydrogeologically side gradient to the Subject Site.

There is no evidence of environmental impacts to the Subject Site from this SWF/LF site.

## **5.7 Texas Voluntary Cleanup Program Sites (TX VCP)**

*The TX VCP sites list dated April 30, 2002 has revealed one TX VCP site within the required search radius. ASTM required search radius: 0.5 miles.*

EDR Map ID #: 20. Facility ID #: 767. Project #: 316770. PCA #: 31677. The site is located 0.34 miles north-northwest of the Subject Site. Site Name: Revere Road Landfill. Location: 300 Revere Road El Paso, Texas. Applicant: Covington Capitol, LLC, LTD, 225 North Mill Street Suite 204 Aspen, Colorado 81611. Applicant Contact: Gerald Wendal Telephone: 970-925-4991. Media Affected: Soils. Contaminate Categories: TPH, Lead Phase: Completed. Facility Type: Municipal Solid Waste Landfill. Acres at Site: 7. Certificate of Completion: 09/23/1999. Remedy Type: Excavation, Off-Site Disposal.

## **5.8 Local Permits**

There are no records in the EDR-Industrial Site Package (ISP) (EDR, 2002a) report for the Subject Site regarding air quality permits or issues, water discharge permits or issues, and Occupational Safety and Health Administration (OSHA) health and safety, inspections, violation, or reports of accidents. The EDR-ISP is a comprehensive presentation of government filings on a facility regarding air emissions (permits, releases, and compliance data), water discharges (permits, releases, and enforcement actions), and OSHA health and safety issues at a facility.

City of El Paso permits on file at BSD Records, June 12, 2002

5115 El Paso Drive:     “1952-Permit for construction of a chain link fence”  
                              “August 20, 1979-Building plans submitted for a new office and warehouse building”  
                              “1992-Building plans submitted for a metal building to be used for chemical storage”

5169 El Paso Drive:     No records on file for this property

**Wastewater Discharge Permits:**

The City of El Paso was contacted on June 17, 2002 regarding air quality permits and wastewater discharge permits that may be on file with the city for 5115 and 5169 El Paso Drive. Mr. Al Melero in the air quality division suggested that Tecumseh contact the TNRCC for this information. He said that due to the requirements of the City all requests for public information must be made through the city attorney office. He thought that since the TNRCC does not have this requirement that access to the information would be faster through the TNRCC.

A written request was made to the TNRCC on June 17, 2002 for wastewater discharge permit information. As of the date of this report, the TNRCC has not provided Tecumseh with any information regarding the request.

**Air Quality Permits:**

A conversation with Mr. Kevin Smith, Air Section Manager with the TNRCC, on June 17, 2002 revealed that the present and former occupants at the Subject Site have had no air quality permit on file with the TNRCC. Mr. Smith said that East-West Apparel was exempt from permitting due to the date the business was established. Mr. Smith reviewed the TNRCC database and determined that East-West Apparel has an account number with the TNRCC. Mr. Smith said that the account number was established with the TNRCC due to two past air quality violations. An inspection of the property was made by the TNRCC in 1991. The TNRCC database did not provide the details of the air quality violation.

## **6.0 SITE INVESTIGATION**

### **6.1 Current Site Conditions**

Mr. Frank Welker, Senior Engineer, and Mr. James Morris, Principal Engineer, both with Tecumseh, attended a pre-project meeting and site visit in El Paso, Texas on May 31, 2002. Mr. Welker conducted the on-site visual inspection and photographed the Subject Site on June 12 and 13, 2002. Mr. Welker compiled pertinent information regarding the Subject Site and prepared the Phase I ESA report. Mr. David Esparza, Senior Environmental Specialist with Tecumseh, provided oversight of Mr. Welker's work. Photographs of the Subject Site and its adjacent properties are presented in Appendix A.

The Subject Site consists of two contiguous parcels of land designated C-4 Zoning. The parcel-addressed 5115 El Paso Drive consists of 4.72 acres (205,603 square feet) of fenced land, a 58,800 square foot building, a 726 square foot detached metal building, paved and unpaved parking lots, an outside concrete storage deck, and a storm water catch basin. The parcel-addressed 5169 El Paso Drive is located immediately east of 5115 El Paso Drive with a single-family residence, address 5159 El Paso Drive, which separates 102 feet of the border between the two parcels. 5115 El Paso Drive and 5169 El Paso Drive share a common border for a length of 150 feet. Parcel 5169 El Paso Drive consists of 0.55 acres (23,958 square feet) of land secured by a block wall and chain link fence, a 10,002 square foot building, paved parking lots, a small storm water catch basin, and a concrete tank existing above and below the ground surface that was a process effluent pre-treatment facility. Complete description of the two contiguous properties is provided below. An index map and a site map for each parcel are provided in Appendix A.

#### **5115 El Paso Drive**

This facility was constructed in 1982 as a garment manufacturing plant and has operated under the names of Viola Sportswear and East-West Apparel, Inc. Millennium Plastics Technologies, LLC, a manufacturer of injection molded plastic components, has occupied the facility since the mid 1990s. This parcel of land is accessed from El Paso Drive via a driveway with a security gate. This parcel is in the shape of a rectangle and extends north from El Paso Drive 750 feet to the northern property boundary, and is 218 feet wide east to west. The parcel has three narrow strips of land protruding from the main rectangle, two that extend off the east property line east to Colfax Street, and a third that extends from the northeast corner of the property north until it terminates at Montview Court. Parking areas are provided in front of the building that faces El Paso Drive and in the area east of the building from El Paso Drive to where the building ends and the paved parking terminates. Semi-truck and trailer parking is provided north of the building extending north to the property line. On the day of the site visit, numerous semi-truck trailers were parked in this area. The main entrance to the office portion of the building is located in the front southeast corner. Additional entrances to the office are provided on the east side of the building along with entrances to the fabrication and warehouse portion of the building. Semi-truck loading docks are situated on the east side of the building and a detached 726 square foot metal building that houses air compressor equipment is located immediately north of the loading docks. Located at the rear of the building is a raised concrete pad used as a storage area that extends across the width of the building for 125 feet and is 62 feet wide. The concrete pad is equipped with a catch channel measuring 3 feet wide by 1 foot deep that encompasses the circumference of the pad. The channel empties on the east side of the concrete pad onto the paved parking lot. A concrete ramp located on the east side of the pad provides forklift access to this storage area. Located north of the building and the concrete pad is a storm water catch basin that measures 211 feet north to south and 50 feet east to west with a depth greater than 10 feet. The pit collects storm water that drains off the west side of the building's roof via gutters onto a concrete channel that directs the water towards the pit. There is also a 2-inch diameter steel pipe that protrudes through the west wall of the building just above the level of the concrete channel.

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The steel pipe extends to and terminates in the storm water catch basin. On the day of the site visit, the storm water catch basin was dry and there was no soil staining at the discharge point of the 2-inch diameter steel pipe although there was evidence that fluid had once flowed out the pipe and into the pit. The pit walls on the west side are dark in color and on closer inspection look to be cinders, material that has been heated to high temperatures. There is also pieces of roofing tar and an area where once liquid roof tar or asphalt was dumped in the pit causing staining of the soil down the side of the pit wall and in a confined area in the bottom of the pit. The stained soil was no more than two inches thick before unstained soil was reached. The pit also contained domestic garbage that blew into the pit or was randomly placed there. The total amount of garbage is estimated to be less than a cubic yard. The soil at the far north end of the pit was dark in color compared to the other soil located south of this area. A recent fire had occurred in the wood pallet storage yard that borders 5115 El Paso Drive to the north. The heat from the fire had melted plastic and rubber components of the semi-trailers parked along the north fence at 5115 El Paso Drive. The soil at this portion of the Subject Site was darkened from the ash and smoke emanating from the wood pallet fire.

This building is constructed of pre-formed concrete walls set on a concrete foundation with concrete floors. The building has a flat roof constructed of corrugated steel panels with two-thirds of the roof consisting of an asphalt built-up roofing system finished with pea gravel and the back or north one-third of the roof consisting of a membrane roofing material with a white colored finish. Located on the roof are 30 evaporative coolers above the fabrication and warehouse area, and 5 air conditioners (refrigerated air units) located above the office space. The roof appeared in good condition with the exception of a small area of the parapet wall on the east side where the roofing material was separating. The air conditioners appeared to be in fair condition and there were no apparent oil or fluid leaks. Some of the evaporative coolers were in poor condition and in need of repair or replacement. A 2-inch diameter steel pipe that supplies natural gas to the building was situated on the west side of the roof.

The interior of the building consists of 10,860 square feet of air-conditioned office space and 47,940 square feet of fabrication and warehouse space. The office space is subdivided with walls constructed of drywall and the ceilings consist of suspended metal frames with 2 feet by 4 feet acoustical panels. The flooring consists of a combination of brick pavers in the entry, vinyl floor tiles in the hallways, break room, and laboratory and carpet in the remaining offices. Recessed fluorescent panels in the suspended ceiling and hanging fluorescent light fixtures provide lighting. The fabrication area of the building has painted concrete floors with a portion of this area fitted with a lower ceiling constructed of drywall. The warehouse area of the building has unpainted concrete floors, exposed concrete walls, and exposed roof joist and roof decking. Forced air natural gas heaters suspended from the ceiling provide heating. Hanging fluorescent light fixtures provide lighting in this portion of the building. The building is supplied with 1,200-amps three-phase electrical service, and the building is equipped with a sprinkler system for fire protection. The warehouse area of the building and a portion of the fabrication area have 18 feet clear ceiling height. The building is fitted with three pairs of restroom facilities. One pair is in the office area and two are in the warehouse area. Located at the northwest corner of the building in the warehouse area is a separate room that is called the maintenance room. The entrance door to this room is fitted with a chemical placard that says corrosive. This room did not contain any chemicals on the day of the site visit but emitted a chemical odor even though the swamp cooler was running and circulating fresh air through the room. There were two pieces of equipment in the room: one a lathe, and the other a milling machine. The floor of this room has some minor staining possibly machine oil used in conjunction with the equipment. The remainder of this building is very clean with little or no staining on the floors with the exception of the janitor's washroom located in the warehouse portion of the building. Photographs of the inside of the building and the outside fixtures, features, and the grounds are presented in Appendix A.

In the warehouse portion of the building is a janitor washroom where cleaning chemicals are stored. The chemicals stored there include: one 5-gallon container and one 55-gallon drum of cold-water floor strippers (labeled corrosive), and one 5-gallon container of Power Kleen 283 PTB cleaner and degreaser. The floor of this room was stained and dirty and showed the effects of storing and handling chemicals over time. Also located in the warehouse was a floor-finishing machine with a 12-volt wet cell battery sitting next to it and a wood pallet where paint and painting solvents were temporarily stored. On the pallet were twenty-one 1-gallon containers of paint, three 5-gallon buckets of paint and one 5-gallon container of mineral sprits. Located in the detached metal building where the air compressors are located were a number of different chemicals. The chemicals consisted of two 30-gallon containers of sodium hydroxide (one empty and one partially full), one 5-gallon container of sodium hydroxide (empty), two 5-gallon containers of compressor oil (one empty and one partially full), a container of WEM CL 595 Tower Brom 90M, and two 1-gallon containers of bleach. None of the chemical containers have secondary containment. The floor of this building was stained below where one of the compressors is situated. The material safety data sheets (MSDS) were available at this building and were reviewed on-site the day of the site visit. A listing of the chemicals used at this facility as compiled from the material safety data sheets is provided in Appendix E. Photographs of the janitor washroom, and the inside of the metal building are presented in Appendix A.

### **5169 El Paso Drive**

This facility was constructed in the early to mid 1980s as a wet processing plant that was a part of the garment manufacturing plant located at 5115 El Paso Drive. The City of El Paso could not locate a building permit or approved building plans for the structure at 5169 El Paso Drive (Gonzalez, 2001). The building at this parcel did not appear in the 1979 aerial photograph reviewed in the preparation of this report, but did appear in the January 1986 aerial photograph, less the office space and attached metal storage building. The wet processing plant treated garment material (denim) with a chemical and mechanical process referred to as “stone washing”. The process used potassium permanganate (a strong oxidizer) and pumice stone to bleach the denim to a faded light-blue color (MMS, 1991). Additional chemicals were presumably used to neutralize the potassium permanganate solution following its use and final disposal into the City of El Paso sewer system. These post process treatment chemicals were probably sodium bisulfite, the recommended neutralizing agent for potassium permanganate (Spectrum, 2002). This facility has operated under the names of Viola Sportswear and East-West Apparel, Inc. On the day of the site visit, this building had been closed up for an undetermined amount of time, and upon entering the building, a strong chemical odor was noticed throughout the building.

This parcel of land is accessed from El Paso Drive via a driveway equipped with a security gate. This parcel is in the shape of a rectangle less the southwest corner. This parcel extends north from El Paso Drive, 253 feet to the northern property boundary. This parcel is 118 feet wide east to west at the north end and 69 feet wide east to west at the south end along El Paso Drive. Parking areas are provided in front of the building that faces El Paso Drive. There is a storm water catch basin located at the front of the parcel next to El Paso Drive that drains the asphalt parking lot. The pit measures 22 feet by 14 feet, which tapers downward to about 3 feet in depth and is enclosed by a cinder block wall and a chain link fence. The pit was dry on the day of the site visit and contained a living elm tree, weeds, pieces of lumber, and domestic garbage. There was no visible soil staining in the pit but the entire surface of the ground could not be observed due to the debris covering it. A concrete pad that runs the length of the parking lot from the entrance to the property to just short of the building at one time had three ASTs placed there. The concrete pad was stained with the circumference of the ASTs. The diameter of the ASTs was 7 feet. The concrete pad contains a catch channel that runs the entire length of the pad. The channel is not covered and terminates at a sump at the end of the channel nearest the

building. The sump is full of dirt and no drain was visible. The asphalt parking lot had been patched (about 3 feet wide) from the sump to the southeast corner of the building. It appears that the parking lot was excavated to install or repair piping that runs from the building to the sump or the piping that surfaces next to the sump. It appears that the piping was possibly connected to the ASTs and carried the material stored in the ASTs into the building.

Next to the building adjacent to the concrete pad and sump is another series of pipes that exit the building, some going underground and some terminating outside the building. Some of these pipes may connect to the piping that surfaces just south of the building where the sump is located. The parking lot had been patched between where these pipes go underground towards the sump area.

The building is constructed of cinder blocks on a concrete foundation with concrete floors and a flat roof. The roof is constructed of corrugated steel panels topped with a membrane roofing material with a white colored finish. Located on the roof are 9 evaporative coolers. The main entrance to the office portion of the building is located on the southwest corner that is also the front on the building. An additional entrance to the second floor of the office is provided on the west side of the building via an exterior staircase. The attached office building appears to be of newer construction than the process/warehouse portion of the building. There is an entrance door to the process area of the building at the front southeast corner of the building. There are three loading docks with overhead garage doors fitted to the building. One is located in front of the building on the southeast corner facing south, the second is located at the rear of the building in the northwest corner facing west, and the third is located at the rear of the building on the northeast corner facing east. An attached 1,700 square feet metal storage building is located on the west side of the main building. This metal building attachment is fitted with two 8 feet by 8 feet overhead garage doors. The metal building contained numerous pieces of steel conduit, electrical wires, steel pipe, and miscellaneous construction materials. Located at the northeast corner of the property next to the loading dock are 6 poly-chemical containers with capacity of 275 gallons. One of the containers has a label that identified the product as DeeZee Zeesoft S-100 a garment softener. The telephone numbers listed on the label were called on June 20, 2002 and all three numbers were disconnected. There were two empty 55-gallon drums located on the east side of the building. One drum has methanol stenciled on it the other had no label. Material safety data sheets were not available for this property.

The interior of the building consists of 10,002 square feet of office and process/warehouse space. The office space is a two-story structure about 1,000 square feet per floor, subdivided with walls and ceilings constructed of drywall. There are three offices and two restrooms on the ground level and three offices and a hallway on the second floor. An interior staircase provided access to the second floor. The flooring consists of ceramic tile on the first floor and vinyl floor tiles on the second floor. Fluorescent light fixtures mounted on the ceiling provide lighting. The process/warehouse area of the building has unpainted concrete floors, painted cinderblock walls, and exposed roof joist. The ceiling of the process/warehouse area is insulated with plastic wrapped fiberglass insulation and is fitted with skylights. Forced air natural gas heaters suspended from the ceiling provide heating. Hanging fluorescent light fixtures provide additional lighting in this portion of the building. The ceiling of the process/warehouse portion of the building is a maze of steel piping and electrical conduits. Some of the steel piping is continuous and others terminate open ended and are not currently in use. Some of the piping is fitted with valves and sprinkle heads. It was not determined if the sprinkler system was functional.

The floor of the process/warehouse area is fitted with numerous drains with perforated iron covers and a catch channel with plate steel covers, which runs the perimeter of this area. Some of the floor drains were standing full of fluid on the day of the site visit and some areas of the catch channel also contained small amounts of

fluid. One floor drain with no cover located in a catch channel contained a multi-colored gelatinous material (see Appendix A, photograph # 53 to view a picture of this floor drain). All of the iron-drain covers and the plate steel catch channel covers were extremely corroded and appear to have been exposed to corrosive chemicals. It was not determined exactly where the floor drains connect, but it is assumed they connect to the City of El Paso sewer system.

An investigation of where the drainpipes actually connect should be conducted. It appears that the catch channel connects to the piping system that runs to the concrete pre-treatment tank located outside the building at the northeast corner of the property, but this could not be precisely determined.

The steel covers are very heavy and rusty and were not lifted from the channel to determine if the channel is still connected to the piping that runs outside the building to the concrete tank. The catch channel terminates at the wall of the building where just outside this wall the concrete tank is located. The process/warehouse area also contained one partially full 30-gallon drum of acetic acid, one 55-gallon drum of sodium hydroxide; and numerous poly chemical containers like the ones stored outside. None of the containers had secondary containment and there were areas in this portion of the building where the floor was wet and also stained. Two natural gas fueled boilers, two large mixing vats, and three industrial garment washing machines were in this building on May 31, 2002. On the day of the site visit, all the equipment had been removed except for the mixing vats and a small boiler.

There is one open top concrete tank located on this property. The tank is outside and adjacent to the building at the northeast corner of the property. The tank appears to be a pre-treatment facility for effluent generated from the former operation at the property. The tank has greater than one-half of its volume below the ground surface and is referred to as an UST throughout this Phase I ESA report. The UST is equipped with a series of copper pipe coils around its interior circumference, multiple inlet pipes that exit the process/warehouse building and enter the UST, and a discharge pipe situated higher than the inlet pipes at the opposite end. The copper piping inside the UST and all the steel hardware on the UST is heavily corroded. The discharge pipe appears to connect to the City of El Paso sewer system as evidenced by multiple manhole covers in a concrete lined basin that is in alignment with the UST and discharge pipe. On the day of the site visit, approximately one third of the UST volume contained fluid that appeared to be wastewater with an oil skim floating on top. The UST and the entire area around the UST emitted a strong chemical odor. The UST has outside dimensions of 7 feet by 13 feet, and the exterior walls extend 3.5 feet above the ground surface. The depth of the UST was not determined due to the fluid that it still retains, but the depth is estimated to be approximately 7 feet measured from the tops of the walls. The steel inlet pipes that are 6 inches in diameter are partially wrapped with insulation between the building and the UST. The tank has electrical conduit attached to the outside that could have supplied a pump and/or lighting. The top of the UST is open and presents a falling and drowning hazard to persons or animals that may investigate the UST. Located along side the UST is an empty 55-gallon drum with no top labeled methanol and two dilapidated refrigerators. No fluids were leaking from the mechanical area of the refrigerators.

## **6.2 Hazardous Substances**

The Subject Site is not identified in any of the federal, state, or local databases that were searched in accordance with ASTM standards for a government records review. The El Paso Fire Department was contacted on June 13, 2002, regarding reports of hazardous material spills, fires, and accidents occurring at the Subject Site. Ms. Nancy Munoz, Records Clerk with the Fire Department, searched the database of reported incidents back to January 1991. The database had one report of a utility pole being knocked over at 5115 El Paso Drive on October 15, 1994. The Fire Department has no reports of incidents at 5169 El Paso Drive. When the Fire Department was contacted by McClelland Management Services (MMS) in November, 5115 and 5169 El Paso Drive

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1991, regarding reported incidents at 5115 El Paso Drive, the information MMS received was that there had been a dumpster fire at this location on April 1, 1991 (MMS, 1991).

The MSDS sheets for 5115 El Paso Drive were reviewed on-site the day of the site visit. The MSDS sheets revealed that various chemicals have been used and stored at this facility.

A list of the chemicals and substances compiled from the MSDS sheets is presented in Appendix E. Chemicals known to have been used at this facility and at 5169 El Paso Drive include potassium permanganate, sodium bisulfite, sodium hydroxide, acetic acid, and hydrogen peroxide. Material safety data sheet for these chemicals are presented in Appendix E.

Based on the review of previous environmental site assessments conducted for the Subject Site, visual observations during the site visit, and interviews with various federal, state, local government agencies, and private business concerns, Tecumseh reviewed documents that provide evidence of hazardous substances being stored and used at both properties and observed hazardous substances on-site. On May 31, 2002, the property at 5115 El Paso Drive in the northwest corner of the warehouse had containers of acetic acid and sodium hydroxide placed in close proximity to each other. These two chemicals are not compatible and posed a potential hazard should the chemicals leak and contact each other. All the chemical drums were sitting in individual portable secondary containment basins. In the detached metal building were containers of sodium hydroxide, Oxychem Towerbrom 90M (an oxidizer), and another chemical with a Health Code of 3, named WEM CW 2547. The chemicals stored in the warehouse had been removed on June 13, 2002. There is no evidence of a chemical release or a material threat of a release that would present a material risk of harm to public health or the environment at 5115 El Paso Drive.

The property at 5169 El Paso Drive had containers of acetic acid, hydrogen peroxide, and containers of DeeZee labeled chemicals stored in the building. None of the containers were equipped with secondary containment. This facility also reportedly used potassium permanganate in its garment bleaching process as documented in the environmental site assessment conducted by MMS in September 1991. From visual observation made during the preliminary walk through on May 31, 2002, and during the actual site visit on June 13, 2002, it is possible that hazardous materials have penetrated the concrete floor of the building and the soil beneath the building via permeable concrete and through corroded drainpipes beneath the floor. The soil could have also been contaminated via a possible leaking pipe that transferred the potassium permanganate between the former ASTs and the building. The concrete UST is also an area of concern. The UST contained wastewater with an oil component floating on top the day of the actual site visit. All the metal components of the UST are severely corroded and the entire area has a strong chemical odor. It is possible that the tank leaked some of its contents to the surrounding soil via permeable concrete or a failed steel pipe. At 5169 El Paso Drive there is strong evidence of a chemical release or a material threat of a release that could present a material risk of harm to public health or the environment. The property bordering 5169 El Paso Drive, and immediately adjacent to the concrete UST, is a single-family residence. There were no MSDS sheets available for 5169 El Paso Drive.

An area of concern off-site should also be examined. The residence at 5159 El Paso Drive is also used as an auto repair shop. There are numerous automobiles in various degrees of disassembly and repair located on the property. The items of concern include: used motor oil, antifreeze (ethylene glycol), gasoline, solvents and wet cell batteries containing sulfuric acid. The concern involves the possible disposal of the above-mentioned items on-site.

### 6.3 On-Site and Off-Site Fuel Storage Tanks

There is one unregistered UST located at 5169 El Paso Drive. The UST is an open top concrete tank located outside and adjacent to the building at the northeast corner of the property. The UST appears to be a pre-treatment facility for effluent generated from the former operation at the property. The UST has greater than one-half of its volume below the ground surface. The UST is equipped with a series of copper pipe coils around its interior circumference, multiple inlet pipes that exit the process/warehouse building and enter the UST, and a discharge pipe situated higher than the inlet pipes at the opposite end. The copper piping inside the UST and all the steel hardware on the UST is extremely corroded. The discharge pipe appears to connect to the City of El Paso sewer system as evidenced by multiple manhole covers in a concrete lined basin that is in alignment with the UST and discharge pipe. On the day of the actual site visit approximately one third of the UST volume contained fluid that appeared to be wastewater with waste oil floating on top.

The UST and the entire area around the UST emitted a strong chemical odor. The UST has outside dimensions of 7 feet by 13 feet and the exterior walls extend 3.5 feet above the ground surface. The depth of the UST was not determined due to the fluid that it still retains, but the depth is estimated to be approximately 7 feet measured from the tops of the walls. The steel inlet pipes that are 6 inches in diameter are partially wrapped with insulation between the building and the UST. The UST has electrical conduit attached to the outside that could have supplied a pump and/or lighting. The top of the UST is open and presents a falling and drowning hazard to persons or animals that may investigate the UST. Photographs of the concrete UST are presented in Appendix A.

There are twenty-three USTs at ten different sites located within 0.25 miles of the Subject Site identified in the EDR report. There are nine LUST sites identified in the EDR report within a 0.5-mile radius from the Subject Site. Of the nine LUST sites, seven sites are reported as “case closed” and one site is reported: *Priority: Groundwater impacted, no apparent threats or impacts to receptors. Status: Final concurrence pending documentation of well plugging.* The last site is reported: *Priority: Assessment incomplete, no apparent threats or impacts to receptors. Status: Site Assessment.*

There are 5 LUST sites (EDR map #: B6, C7, 21, 23, and 24) that are hydrogeologically up gradient to the Subject Site. There is no evidence of environmental impacts to the Subject Site from any of these LUST sites.

### 6.4 Asbestos-Containing Material (ACM)

MMS conducted an environmental site assessment in 1991 at 5115 El Paso Drive, with limited sampling for suspected ACM. The assessment confirmed ACM in floor tile and mastic in a utility closet, electrical closet, employee lunchroom, two offices, and insulation on a boiler door. MMS recommended that an operations and maintenance program be established for controlling all ACM. MMS did not recommend removal of the tile. Tecumseh recommends testing the floor tile remaining in this building for ACM, if it corresponds with the description and location of the tile MMS found containing ACM.

The other suspected ACM is at 5169 El Paso Drive. The suspected ACM is insulation material on the boiler located in the process/warehouse portion of the building and the insulating material around the steel pipes that run outside from the northeast side of the building to the concrete UST.

### 6.5 Lead-Based Paint

Based on the age of the buildings located at the Subject Site (constructed in 1982), it is unlikely that lead-based paint was applied to these structures. As a precautionary measure, before any paint removal activities are implemented, paint chips from the proposed remolded area should be tested for lead. If the paint is found to contain lead, appropriate measures should be taken to prevent paint dust and paint chips from being released into the environment.

## **6.6 Polychlorinated Biphenyls**

There are four pole-mounted electrical transformers located at the Subject Site. All the transformers are affixed with a blue label that states “Contains No PCBs”. There are two electrical components sitting on concrete pads located on the north side of the detached metal building at 5115 El Paso Drive. Both electrical components display labels that state “Contains No PCB”. All the transformers are in good condition and there was no visible signs of the vessels leaking fluids. There are numerous fluorescent light fixtures located in the buildings at 5115 and 5169 El Paso Drive. Inspection of two readily accessible light fixtures in the office area of 5115 revealed that these two electrical ballasts were labeled “No PCBs.” It is possible that some of the light fixtures in these buildings are fitted with ballasts that contain PCBs.

## **6.7 Water, Sewer, and Electrical Power**

Electrical and natural gas service are provide to the Subject Site by El Paso Electric and Southern Union Gas Company respectively. The City of El Paso provides water and sewer services to the Subject Site. El Paso Disposal provides solid waste service.

## **6.8 Lead in Drinking Water**

The City of El Paso provides potable water to the Subject Site. There is no issue of lead in drinking water at the Subject Site.

## **6.9 Landfills**

No landfills were identified to exist on-site based on the EDR report and on-site observations. Miscellaneous solid waste (domestic garbage and minor construction debris) was observed at two locations on the Subject Site during Tecumseh’s site visit on June 13, 2002. The solid waste is located in two catch basins at 5115 and 5169 El Paso Drive. The volume of the solid waste material is estimated to be less than one cubic yard.

### **Off-Site Landfills**

There is one SWF/LF site located 0.13 miles east of the Subject Site which was identified in the EDR report. Information regarding the SWF/LF site is presented in Section 5.6. There is one TX VCP site located 0.34 miles north of the Subject Site identified in the EDR report. The site name is the Revere Road Landfill and the contaminate categories are petroleum hydrocarbon and lead metal. Information regarding the TX VCP site is presented in Section 5.7.

## **6.10 Pits, Sumps, Drywells, and Catch Basins**

### **5115 El Paso Drive**

Located north of the building is a storm water catch basin that measures 211 feet north to south, and 50 feet east to west with a depth greater than 10 feet. The catch basin collects storm water that drains off the west

side of the building's roof via gutters onto a concrete channel that directs the water towards the catch basin. There is also a 2-inch diameter steel pipe that protrudes through the west wall of the building just above the level of the concrete channel. The maintenance room is located in the area where the pipe enters the building. The steel pipe extends to and terminates in the storm water catch basin. On the day of the site visit, the catch basin was dry and there was no soil staining at the discharge point of the 2-inch diameter steel pipe. There was evidence that fluid had once flowed out the pipe and into the pit. The walls of the catch basin on the west side are dark in color and on closer inspection look to be cinders, material that has been heated to high temperatures. There is also pieces of roofing tar, and an area where once liquid roof tar or asphalt was dumped in the pit causing staining of the soil down the side of the catch basin wall and in a confined area in the bottom of the catch basin.

#### **5169 El Paso Drive**

There is a storm water catch basin located at the front of this parcel next to El Paso Drive that drains the asphalt parking lot. The catch basin measures 22 feet by 14 feet, which tapers downward to about 3 feet in depth; and is enclosed by a cinder block wall and a chain link fence. The catch basin was dry on the actual day of the site visit but did contain a live elm tree, weeds, construction debris, and domestic garbage. There was no visible soil staining in the catch basin but the entire surface of the ground could not be observed due to the debris.

There is a sump located in a concrete pad in front of the building. The concrete pad extends the length of the parking lot from the entrance to the property to just short of the building. The concrete pad at one time had three ASTs placed there. The concrete pad contains a catch channel that runs the entire length of the pad. The channel is not covered and terminates at a sump at the end of the concrete pad nearest the building. The sump is full of dirt and no drain was visible. It appears that the sump is connected to the City of El Paso sewer system. The asphalt on the parking lot had been patched from the sump towards the building. The patched asphalt terminates at a sewer manhole cover.

### **6.11 Storm Water Drainage**

#### **5115 El Paso Drive**

Storm water drains from this property south onto El Paso Drive or into the catch basin discussed in Section 6.10.

#### **5169 El Paso Drive**

Storm water drains from this property south onto El Paso Drive and into the catch basin discussed in Section 6.10.



## 7.0 CONCLUSIONS

The United States Army Corps of Engineers and the City of El Paso, Texas retained Tecumseh Professional Associates, Inc. (Tecumseh) to perform a Phase I Environmental Site Assessment on two contiguous properties located within the City of El Paso, at 5115 and 5169 El Paso Drive (the Subject Site). The Phase I Environmental Site Assessment has been conducted according to American Society for Testing and Materials Designation E 1527-00 guidelines and in accordance with Comprehensive Environmental Response, Compensation, and Liability Act 120(H), U.S. Army Corps of Engineers Regulation 1165-2-132 HTRW Guidance for Civil Works Projects, and generally accepted environmental industry standards. Tecumseh's Phase I ESA was performed during June of 2002.

Two previous assessments were conducted at the Subject Site. McClelland Management Services, Inc., (MMS) conducted an environmental site assessment with limited sampling for suspected asbestos containing material in 1991. The assessment confirmed ACM in floor tile and mastic in a utility closet, electrical closet, employee lunchroom, two offices, and insulation on a boiler door. MMS recommended that an operations and maintenance program be established for controlling all asbestos containing material. MMS did not recommend removal of the tile. No other recognized environmental conditions were identified at the Subject Site as a result of this environmental site assessment.

AGRA Earth & Environmental conducted a limiting sampling and analysis program at the Subject Site in 1995. The program included soil borings, with soil samples tested for manganese, potassium, sodium, chlorides, and sulfate. Soil pH was also measured. Soil samples were collected at the north and south side of the building at 5115 El Paso Drive, at the northeast corner of 5169 El Paso Drive next to the wastewater treatment facility (concrete underground storage tank [UST]), and in the storm water catch basin at the front of this property. AGRA reported that concentrations of compounds targeted during their investigation were within published ranges for unaffected native materials, and that concentrations of target compounds in the areas where potential wastes were used were comparable to the background sample concentrations for all parameters. Soil pH was found to be elevated in only one sample, and AGRA reported that the pH of 9.0 in that particular sample was slightly above the background range for the Subject Site (AGRA, 1995).

**This assessment has revealed the following recognized environmental conditions on the Subject Site at the following locations:**

### **5169 El Paso Drive**

There is one unregistered UST located at 5169 El Paso Drive. The UST is an open top concrete tank that appears to be a pre-treatment facility for effluent generated from the former operation at the property. Chemicals that have been used at this facility include potassium permanganate, sodium bisulfite, sodium hydroxide, acetic acid, and hydrogen peroxide. Material safety data sheets for these chemicals are presented in Appendix E. The tank has greater than one-half of its volume below the ground surface. The tank is equipped with multiple inlet pipes that exit the process/warehouse building and enter the tank. A discharge pipe situated higher than the inlet pipes is located at the opposite end from the inlets. All metal hardware on the tank is heavily corroded. The discharge pipe appears to connect to the City of El Paso sewer system as evidenced by multiple manhole covers located in an adjacent concrete basin that is in alignment with the tank and discharge pipe. On the day of the site visit, approximately one third of the tank volume contained fluid that appeared to be wastewater with an oil film floating on the surface. The tank and the entire area around the tank emitted a strong chemical odor on the day of the site visit. The top of the tank is open and presents a falling and drowning hazard to persons or animals that may investigate the tank. It is possible that the tank has leaked some of its contents to the surrounding soil via permeable concrete or a leaking steel pipe. Strong evidence

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exists of a chemical release or a material threat of a release that could present a material risk of harm to public health or the environment at this UST site. The property bordering 5169 El Paso Drive to the north that is less than 20 feet from the concrete UST is a single-family residence. A more in depth discussion regarding this UST is presented in Sections 6.1 and 6.3.

The property at 5169 El Paso Drive used and stored various hazardous chemicals. On May 31, 2002, the day of the pre-project site walk-through, there were containers of acetic acid, hydrogen peroxide, sodium hydroxide, and unknown quantities of DeeZee brand chemicals stored in the building. None of the chemical containers were equipped with secondary containment. Located outside the building next to the concrete UST was an empty 55-gallon drum stenciled methanol. On June 13, 2002, the official day of the site visit, this building had been closed up for an undetermined amount of time. Upon entering the building, a strong chemical odor was noticed throughout the building. This facility also used potassium permanganate in its garment bleaching process as documented in the environmental site assessment conducted by MMS in September 1991. From visual observation made during the preliminary walk-through and during the official site visit, Tecumseh believes that it is possible that hazardous materials spilled on the floor, discharged through the catch channels integrated in the floor of the building, and in steel drainpipes could have penetrated the floor of the building and contaminated the soil beneath the building.

There is also a series of pipes that run from the front of the building underground to a concrete pad where three ASTs were positioned. These ASTs reportedly contained potassium permanganate (MMS, 1991). The chemical was probably transferred into the building via these pipelines. There is also a catch channel in the concrete pad where the ASTs were placed. The catch channel terminates at a sump located at the north end of the concrete pad. The parking lot has been dug up at least twice in the immediate area of the underground pipelines and the sump. There is a possibility that the soil could have been contaminated with potassium permanganate in this area via leaking pipelines and or leaking drainpipes connected to the sump. There is a small storm water catch basin located immediately south and adjacent to the area where the ASTs were located. If the ASTs were overfilled, or if any leakage occurred, the liquid could have drained into this catch basin.

### **5115 El Paso Drive**

Located north of the building at 5115 El Paso Drive is a storm water catch basin that has a confined area of stained soil. The catch basin collects storm water that drains off the west side of the building's roof via gutters onto a concrete channel that directs the water towards the catch basin. There is also a 2-inch diameter steel pipe that protrudes through the west wall of the building just above the level of the concrete channel. The maintenance room is located in the area where the pipe enters the building. The steel pipe extends to and terminates in the storm water catch basin. On the day of the site visit, the catch basin was dry and there was no obvious soil staining at the discharge point of the 2-inch diameter steel pipe. There was evidence that fluid had once flowed out the pipe and into the catch basin. The walls of the catch basin on the west side are dark in color and on closer inspection look to be cinders (material that has been heated to high temperatures). There are pieces of roofing tar, and an area where liquid roof tar or asphalt was dumped in the catch basin. The liquid stained the soil down the side of the catch basin wall and in a confined area in the bottom. The catch basin also contained domestic garbage that blew into the pit or was randomly placed there. The total amount of garbage is estimated to be less than a cubic yard.

### **Other Environmental Issues:**

Located at 5115 El Paso Drive, in the detached metal building where air compressors are located, were a number of different chemicals placed randomly around the room. The chemicals consisted of two 30-gallon containers of sodium hydroxide (one empty and one partially full), one empty 5-gallon container of sodium

hydroxide, two 5-gallon containers of compressor oil (one empty and one partially full), a container of WEM CL 595 Tower Brom 90M, and two 1-gallon containers of bleach. None of the chemical containers had secondary containment. The floor of this building was stained beneath and around one of the compressors.

Also at 5115 El Paso Drive in the warehouse portion of the building is a janitor's washroom where cleaning chemicals are stored. The chemicals stored there included one 5-gallon container and one 55-gallon drum of cold-water floor stripper (labeled corrosive), and one 5-gallon container of Power Kleen 283 PTB cleaner and degreaser (a concentrated detergent). The floor of this room was stained and dirty and showed the effects of storing and handling chemicals over a long period of time.

Located at the northwest corner of the building at 5115 El Paso Drive in the warehouse area is a separate room called the maintenance room. The door to this room was locked on the day of the pre-project meeting and site walk-through. Located just outside this secured room were drums of acetic acid and sodium hydroxide sitting in secondary containment. The entrance door to this room is fitted with a chemical placard that says "Corrosive." This room did not contain any chemicals on the day of the site visit but two pieces of equipment were located there. The floor has some minor staining and this room emitted a chemical odor even though the swamp cooler was running and circulating fresh air throughout the room.

**This assessment revealed potential recognized environmental conditions off-site that could impact the Subject Site.**

There is an area of concern off-site that borders the Subject Site that should be examined. The residence at 5159 El Paso Drive is also used as an auto repair shop. There are numerous automobiles in various degrees of disassembly and repair located on the property. The items of concern include used motor oil, antifreeze (ethylene glycol), gasoline, solvents, and wet cell batteries containing sulfuric acid and lead metal. The concern involves the possible disposal of the above-mentioned items on-site that could have an impact on the Subject Site.

## **8.0 RECOMMENDATIONS**

### **5169 El Paso Drive**

There are numerous areas of concern at 5169 El Paso Drive where hazardous chemicals have been stored, used, and discharged into floor drains and catch channels, into a concrete UST, and into the City of El Paso sewer system. It was not determined exactly where the floor drains connect, but it is assumed they connect to the City of El Paso sewer system. An investigation of where the drainpipes actually connect is recommended.

Tecumseh recommends that specific areas in the interior building and exterior be investigated further. There is the potential for soil contamination beneath the floor of the building, around the perimeter, and beneath the UST. Another area where soil contamination could be present is at the sump located on the concrete pad where potassium permanganate was stored in ASTs, and the storm water catch basin that is adjacent to where the ASTs were located.

Future investigation activities should include collecting samples of wastewater remaining in catch channels, floor drains, and the UST, and obtaining soil samples at specific areas located outside the building as identified above. The wastewater and soil samples should be analyzed for potassium permanganate (and its components), sodium bisulfite, sodium hydroxide, acetic acid, total petroleum hydrocarbon(s), solvents, and hydrogen peroxide. These chemicals are known to have been used at the facility or are suspected to be present there. A full toxicity characteristic leaching procedure (TCLP) should be run on specific samples at this site.

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Suspected ACM at 5169 El Paso Drive:

Tecumseh recommends testing the suspected ACM at this building/parcel. The suspected ACM includes insulation material on the boiler located in the process/warehouse portion of the building, and insulating material around the steel pipes that run outside from the northeast side of the building and connects to the concrete UST.

**5115 El Paso Drive**

The storm water catch basin located at 5115 El Paso Drive should also be considered as a likely area where soil contamination may exist. Tecumseh recommends collecting soil samples in various locations within this catch basin. Specifically, at the point where the 2-inch diameter steel pipe terminates at the south end of the catch basin, where the soil is stained where liquid asphalt or roofing tar was dumped at the north end of the catch basin, and at least two places in between these sample areas. The soil samples should be analyzed for potassium permanganate (and its components), sodium bisulfite, sodium hydroxide, acetic acid, total petroleum hydrocarbon (s), solvents, and hydrogen peroxide. A full toxicity characteristic leaching procedure (TCLP) should be run on specific samples at this site.

Suspected ACM at 5115 El Paso Drive:

Tecumseh recommends testing the floor tile remaining in this building if it corresponds to the description and location of the tile MMS found containing ACM in 1991.

*Signature of Environmental Personnel*

\_\_\_\_\_  
**Frank A. Welker**

\_\_\_\_\_  
**Date**

## 9.0 REFERENCES

- American Society for Testing and Materials (ASTM), 2000. Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process – Designation E 1527.
- AGRA, 1995. Limited Sampling Program, Green wood Mills, Inc., El Paso Drive Plant, El Paso, Texas. AGRA Earth & Environmental August 16, 1995.
- Environmental Data Resources, Inc. 2002. Government Records Search, EDR Radius Map with GeoCheck®, June 10, 2002.
- Environmental Data Resources, Inc. 2002a. EDR-Industrial Site Package™ (Air, Water, OSHA Report), June 13, 2002.
- Flores, Antonio, 2002. Storm Water and Pollution Control Chief, Department of Public Works, City of El Paso, Texas, Personal Communication, May 31, 2002.
- Gonzalez, Jose, 2002. BSD Records, City of El Paso, Texas, Personal Communication, June 12, 2002.
- MMS, 1991. Environmental Site Assessment East-West Apparel, Inc. El Paso, Texas. McClelland Management Services, Inc. November 7, 1991.
- Spectrum, 2002. Potassium Permanganate Material Safety Data Sheet, Spectrum Chemical Manufacturing Company.
- TWC (Texas Water Commission), 1991. “A Groundwater Protection Strategy: The City of El Paso” Report 91-01. Austin, Texas.
- TDWR (Texas Department of Water Resources), 1979. “Groundwater Availability in Texas: Estimates and Projections Through 2030.” Report 238.
- TWQI (The State of Texas Water Quality Inventory), 1990. The State of Texas Water Quality Inventory, Tenth Edition, Austin, Texas.
- U.S. Geological Survey, 1997. El Paso, Texas, 7.5 Minute Topographic Map.

## **Appendix A**

Index Map, Site Map, Site Photographs, and Aerial Photographs

## **Appendix B**

Environmental Database Search  
Conducted by EDR Environmental Resources, Inc.

## Index Map



Site Map

## Site Photographs

## Aerial Photographs

## **Appendix C**

### Local Permits and Registrations

## **Appendix D**

### State and Local Agency Reports and Data

## **Appendix E**

Chemicals and Substances List  
MSDS Information

## **Appendix F**

### Qualifications

## **Appendix G**

### Site Health and Safety Plan